

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10808 is that it presents an improbable method of testing.

I also do not understand the term in his letter “deregulation of authorized mode testing”. To me, to “deregulate” would mean to remove an existing regulation. His “mode testing” concept is not in place; therefore how can it then be “deregulated”?

I would think he really meant to regulate eight stated modes other than phone (covered in the basic test), by additional testing specific to that mode.

So, exactly what is a mode? No Code International, on page 2 of their response to RM-9259, dated May 11, 1998 said “Morse code is just another mode available...” Of course, this alludes to their later RM-10786. And the NCVEC states on page 3 of their RM-10787 that Morse is just another of many modes. Can we take a defined emission type to be a mode? If so, read on.

On page 8-10 of the current ARRL Extra Class License Manual, there is a *partial* listing of 630 emission types. As is said on TV, “But wait, there’s more!!” In the ITU Appendix S1 “Classification of emissions and necessary bandwidths”, Sub-section IIA, Basic characteristics, there are only 1,720, give or take a few (my download is dated 12/21/01). Adding Sub-section IIB- Optional characteristics.... brings the possible total to a mere 154,800, using all five symbol columns. Methinks this could be the ultimate MoaB “Mother of all Burdens”.

It also lowers the technical knowledge of the Technician class, which is not in keeping with Part 97.1(d) with respect to technical experts. It also takes away the importance of emergency communications in 97.1(a) by making RACES a separate entity.

In 4, second paragraph, he seems to be attempting to encourage challenging the entire testing system. This seems to parallel RM-10786.

As an aside, in Section 6, he correctly states that we have the largest amateur service in the world. I wonder if any other service under the FCC has as many licensed operators/stations, and therefore, if we are being adequately served by the FCC?

I do, however, concur with is 9 d) to modify the VEC concept.

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

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